



Re: Desal injection and a question

Robert Mace to: Ray Leissner

Cc: Michael Overbay

02/09/2012 10:12 AM

From: "Robert Mace" <Robert.Mace@twdb.texas.gov>

To: Ray Leissner/R6/USEPA/US@EPA

Cc: Michael Overbay/R6/USEPA/US@EPA

History: This message has been replied to.

Ray:

Thanks for the note: good to hear from you! I figured we'd be reconnecting soon on injection wells.

Understand the limitations on Class II: What we are looking to propose is the creation of a Class VII for concentrate and drinking water residuals that looks like a Class II well such that an operator of a Class II well could get easily dual permitted as Class II/VII. Would love to hear your thoughts on this.

Interesting question on life of a private water well... I would guess that's one of those "it depends" questions. Depends on the geology, chemistry, completion quality and construction, and landowner upkeep, I imagine. From personal experience working south of DFW years ago it was not unusual to come across wells older the 50 years not in the state's (TWDB and TCEQ) database.

Let me see what my guys know about this.

-r.

>>> Ray Leissner <Leissner.Ray@epamail.epa.gov> 02/09/12 08:19 AM >>>
Bob,

Its been a long time since we last spoke. I hope this email finds you doing well. Mike Overbay said you were asking if desal wastes could go down a Class II. The answer is yes they can, if the Class II injection is for enhanced oil recovery (EOR) and the UIC Class II Director approves the fluid as a viable EOR fluid. If the injection is not for EOR or the Director does not approve the fluid, I'm afraid the answer is no. Class II injection for disposal is not an option under our rules unless the water, or its residuals, came to the surface as a result of the hydrocarbon (HC) production process.

As an example, if a desal plant was desalinating the water brought to the surface in HC production, those residuals would qualify for Class II disposal.

TCEQ passed a Class I NH general permit sometime ago for disposal of desal wastes. That seems to me to be the most practical approach unless the plant resides next to an EOR project that would be willing and able to take the fluid.

Now I've got a question for you.

I'm trying to find any and all information out there relevant to ascertaining the typical life span of a private water well. I've already queried the Goliad GW Conservation District which is my specific location

of interest. They have been most helpful, providing the data they have on the wells of interest. However, other than age and construction, the data provides no further indication of lifespan. So I'm still looking for any information that might be available.

This need for information is driven by an application for exemption of portion of the Goliad aquifer, near Goliad, that you may / may not have heard about. We are asking the applicant (UEC) to model GW capture of the surrounding water wells in an attempt to gain a scientific basis for determining if those wells are destined to capture water currently residing in the proposed exemption. To gain a more real-world result, we wish to model capture for each existing well for their expected life spans. If you've got someone on staff who might have that kind of data or is able to give us some thoughts on the matter, we'd like to talk to them. Or, if you wish to discuss it yourself, give me a call. Either way take care. Thanks.

Ray Leissner, Env. Eng.
Ground Water / UIC Section (6WQ-SG)
(214) 665 - 7183
USEPA, Region 6

The FIRST STEP in protecting your ground water is to have your well tested.



Re: Desal injection and a question

Robert Mace to: Ray Leissner

Cc: Michael Overbay

02/26/2012 04:09 PM

From: "Robert Mace" <Robert.Mace@twdb.texas.gov>

To: Ray Leissner/R6/USEPA/US@EPA

Cc: Michael Overbay/R6/USEPA/US@EPA

Ray:

We don't have info on life of wells around here (an interesting question, though!).

Here's is what I find sniffing around. Tried to see what NGWA says as well.

<http://inspectapedia.com/water/WaterWellLife.htm>

<http://www.essortment.com/long-water-wells-last-25362.html>

<http://answers.yahoo.com/question/index?qid=20080803072732AAoFu33>

<http://info.ngwa.org/gwol/pdf/891149272.PDF>

-Robert.

>>> Ray Leissner <Leissner.Ray@epamail.epa.gov> 2/9/2012 8:18 AM >>>

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